

Decision 16-10-033 October 27, 2016

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Application of San Diego Gas & Electric Company (U902M) for Authority, Among Other Things, to Increase Rates and Charges for Electric and Gas Service Effective on January 1, 2016.	Application 14-11-003 (Filed November 14, 2014)
And Related Matter.	Application 14-11-004

**DECISION AWARDING INTERVENOR COMPENSATION TO UTILITIES
CONSUMERS' ACTION NETWORK FOR SUBSTANTIAL CONTRIBUTION
TO DECISION 16-06-054**

Intervenor: Utility Consumers' Action Network	For contribution to Decision (D.) 16-06-054
Claimed: \$ 264,011.57	Awarded: \$267,534.08
Assigned Commissioner: Michael Picker	Assigned ALJ: John S. Wong and Rafael L. Lirag

PART I: PROCEDURAL ISSUES

A. Brief description of Decision:	<p>As noted in the summary this decision addresses the test year (TY) 2016 general rate case (GRC) applications of San Diego Gas & Electric Company (SDG&E), and Southern California Gas Company (SoCalGas). SDG&E requested a TY 2016 revenue requirement of \$1,895,437,000 (\$324,188,000 for gas operations, and \$1,571,249,000 for electric operations), and SoCalGas requested a TY 2016 revenue requirement of \$2,331,187,000. Prior to the settlement negotiations in these proceedings, the Office of Ratepayer Advocates (ORA), UCAN, and other parties, recommended that adjustments be made to the GRC requests of both SDG&E and SoCalGas. The positions of SDG&E, SoCalGas, and the other parties were fully litigated in evidentiary hearings held in June and July of 2015. Following the evidentiary hearings, SDG&E, SoCalGas, and various other parties held settlement discussions. These discussions resulted in the filing of motions to adopt proposed settlements to resolve almost all of the issues in the GRC applications of SDG&E and SoCalGas. The decision adopts all of the proposed settlements contained in the separate motions to adopt the proposed settlements in SDG&E's GRC application, and in SoCalGas's GRC application, with three adjustments to the revenue requirements.</p>
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B. Intervenor must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812:

	Intervenor	CPUC Verified
Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):		
1. Date of Prehearing Conference (PHC):	1/8/15	Verified.
2. Other specified date for NOI:		
3. Date NOI filed:	2/6/15	Verified.
4. Was the NOI timely filed?		Yes, Utility Consumers' Action Network (UCAN) timely filed the notice of intent to claim intervenor compensation.
Showing of customer or customer-related status (§ 1802(b)):		
5. Based on ALJ ruling issued in proceeding number:	A.14-11-003	Verified.
6. Date of ALJ ruling:	3/2/15	Verified.
7. Based on another CPUC determination (specify):		
8. Has the Intervenor demonstrated customer or customer-related status?		Yes, UCAN demonstrated appropriate status.
Showing of "significant financial hardship" (§ 1802(g)):		
9. Based on ALJ ruling issued in proceeding number:	A.14-11-003	Verified.
10. Date of ALJ ruling:	3/2/15	Verified.
11. Based on another CPUC determination (specify):		
12. Has the Intervenor demonstrated significant financial hardship?		Yes, UCAN demonstrated significant financial hardship.
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	D.16-06-054	Verified.
14. Date of issuance of Final Order or Decision:	7/1/16	Verified.
15. File date of compensation request:	8/30/16	Verified.
16. Was the request for compensation timely?		Yes, UCAN timely filed the notice of intent to claim intervenor compensation.

PART II: SUBSTANTIAL CONTRIBUTION**A. Did the Intervenor substantially contribute to the final decision (*see* § 1802(i), § 1803(a), and D.98-04-059). (For each contribution, support with specific reference to the record.)**

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
<p>Summary:</p> <p>In these consolidated proceedings both SDG&E and SoCalGas submitted their General Rate Case filings. SDG&E requested a total revenue requirement of \$1,895,437,000 and SoCalGas requested \$2,331,187,000. These cases were extensively litigated, and after almost a month of hearings the Sempra utilities, UCAN and several other parties negotiated settlements for both the revenue requirement issues and the non-revenue requirement issues. Through a series of interlocking agreements, the parties settled all issues (with the exception of one tax issue that was carved out).</p> <p>The Commission's decision in D.16-06-054 adopted those settlement agreements.</p> <p>In UCAN's presentation we produced testimony from four witnesses: Laura Norin, Mark Fulmer, Briana Kobor and Robert Sulpizio. While described in more detail below, these witnesses' testimonies covered several revenue requirement issues common to both utilities, and several non-revenue requirement issues raised by UCAN that the Commission accepted.</p> <p>In presenting our substantial contributions below, where the language of the decision discusses UCAN's contributions directly, we will point to that language. There are however instances where the decision, particularly on revenue requirement issues, fails to note party presentation except for the utilities and ORA. For those issues UCAN will be noting the record that was produced, the testimony submitted and the effect our presentation</p>	<p>The settlement agreement's (Exhibit A) attachment 1 is titled: SETTLEMENT AGREEMENT TERMS BETWEEN SAN DIEGO GAS & ELECTRIC COMPANY AND OFFICE OF RATEPAYER ADVOCATES</p> <p>This section of the settlement covers all revenue requirement issues and provides the Commission the factual record to examine the reasonableness of the revenue requirement settlement by putting forward the Sempra Utilities and ORA's litigation positions. Unfortunately, UCAN and other party presentations on specific revenue requirement issues have not been identified in this section of the settlement.</p> <p>Attachment 5 of the Joint Motion for Adoption of Settlement Agreements is titled: SETTLEMENT AGREEMENT AMONG SAN DIEGO GAS & ELECTRIC COMPANY (SDG&E), SOUTHERN CALIFORNIA GAS COMPANY (SOCALGAS), THE UTILITY REFORM NETWORK (TURN), AND UTILITY CONSUMERS' ACTION NETWORK (UCAN)</p> <p>Section I.A of this agreement states that for Test Year 2016 revenue requirement and 2017-18 Post Test Year issues:</p> <p>"SDG&E, SoCalGas and ORA have each represented that in reaching these proposed terms, they considered and incorporated the</p>	<p>Verified.</p> <p>UCAN's representations of the terms of the settlements approved in this consolidated proceeding, as discussed here and below, are accurate and its description of its prior litigation positions is also accurate.</p> <p>Pursuant to (D.) 94-10-029, the Commission has discretion to award compensation to parties who participated in settlement agreements, when there is a finding that they made a substantial contribution to a decision. We find that UCAN's participation in the settlement made a substantial contribution to D.16-06-054.</p>

<p>in testimony and hearings had on particular issues.</p> <p>Given the quality of UCAN's participation throughout the proceedings and UCAN's active participation in negotiating the agreements that were adopted in this decision, UCAN asks that the substantial contributions to the issues we cite below be accepted. UCAN further notes that settlements necessarily reflect compromises, that no parties' positions were adopted across-the-board, and that the UCAN proposals that were not adopted provided leverage to support other proposals that were adopted. UCAN's contribution to this proceeding should therefore be measured holistically, rather than on an issue-by-issue basis.</p>	<p>positions taken in testimony sponsored by TURN and UCAN to the extent those positions were different from and additive to those put forward in ORA's testimony."</p> <p>This language affirms UCAN's role in shaping the revenue requirement agreement that was adopted in this decision, even though the Commission decision does not specify UCAN's contributions in each instance.</p> <p>For the non-revenue requirement issues where the Commission notes UCAN's contributions we will cite to that language in D.16-06-054.</p>	
<p>Overall Outcome</p> <p>In these GRC proceedings the Commission adopted (with 2 limited tax issue exceptions) the SDG&E and SoCalGas settlement agreements to which UCAN was a party.</p> <p>In addition, the Commission decided on the merits, based on TURN's testimony, a tax repairs deduction issue that was carved out of the TURN/UCAN settlement.</p> <p>In addition to a reduction in the requested revenue requirement of \$104 million for SDG&E and \$127 million for SoCalGas, the Commission also accepted UCAN's testimony and the TURN/UCAN settlement positions on not closing 3 SDG&E branch offices through SDG&E's GRC application, limiting the use of two-way balancing accounts, establishing a service establishment fee for new customers of \$5.85 in place of a split fee of \$5.00 for some customers and \$25.00 for others, and, as UCAN and TURN jointly advocated, denying a wholly separate settlement between ORA and the Sempra utilities for a 4 year GRC cycle by adding an additional attrition year (2019) to the 2016 GRC cycle.</p>	<p>"Today's decision adopts all of the proposed settlements contained in the separate motions to adopt the proposed settlements in SDG&E's GRC application, and in SoCalGas's GRC application."</p> <p>"The adopted revenue requirement for SDG&E is \$104 million lower than what SDG&E had requested (\$1.895 billion) in its update testimony."</p> <p>For SoCalGas, "Today's adopted 2016 revenue requirement is \$127 million lower than what SoCalGas had requested (\$2.331 billion) in its update testimony".</p> <p>"The motion filed by ORA, SDG&E and SoCalGas to adopt the proposed settlement to add an additional attrition year (2019) to the test year 2016 GRC cycle of SDG&E and SoCalGas is denied."</p> <p>D.16-06-054 at pp. 3-4</p>	<p>Verified.</p>

Revenue Requirement Issues		
<p>1 New Business</p> <p>Electric Distribution Capital, section 6.2.2.1.3</p> <p>UCAN recommended that SDG&E's requested amounts for new business be reduced by \$31.5 million over 3 years. UCAN argued that SDG&E's projections of new customer growth were inflated and that the Commission should examine funding for new business using 2014 recorded data and not 2014 forecasted data.</p> <p>The settlement and D.16-06-054 adopted a total 3-year revenue requirement for new business of \$170.638 million, which is closely aligned with UCAN's position of \$179.678 million. The adopted amount is \$40.569 million below SDG&E's request of \$211.207 million and is a compromise between the SDG&E, UCAN, and ORA positions</p>	<p>The SDG&E and SoCalGas Residential Customer Forecasts are inflated, and the revenue requested for New Business should be reduced.</p> <p>Exhibit 347, pp. 6-15</p> <p>"UCAN recommends that SDG&E's residential electric customer forecast use the February 2015 housing starts forecast developed by IHS Global Insight, instead of the IHS Global Insight forecast of February 2014 for construction starts. UCAN contends that the construction boom that was anticipated in the February 2014 forecast did not materialize, which resulted in the number of housing starts being too high. UCAN contends that the 2015 IHS Global Insight forecast is more reliable than the 2014 forecast. UCAN points out that the use of the updated forecast has a direct impact on the New Business capital expenditures. UCAN recommends the following amounts for the New Business capital expenditures: 2014 - \$51.724 million; 2015 - \$56.197 million; and 2016 - \$71.757 million. UCAN's recommended amounts are lower than SDG&E's amounts by \$31.5 million over the three-year period."</p> <p>D.16-06-054, p. 74</p> <p>"Based on the testimony of SDG&E, ORA, and UCAN, and the agreements reached in Attachment 1 of the SDG&E Settlement Motion concerning the New Business Projects, the agreed upon amounts are reasonable and should be adopted. The amounts are reasonable because it reflects the actual recorded 2014 expenses, and the agreed upon amounts for 2015</p>	<p>Verified.</p>

	and 2016 reflect a compromise between the methodologies used by SDG&E, and the methodologies advocated for by ORA and others.” D.16-06-054, p. 75	
<p>Post Test Year Ratemaking (Attrition Years)</p> <p>UCAN's testimony maintained that the current Sempra post-test year (PTY) ratemaking proposal would result in unreasonable revenue increases.</p> <p>Through 41 pages of detailed testimony UCAN advocated that the Commission reject the Sempra utilities' methodology for post-test year ratemaking that would result in attrition year increases of 4-5% per year. We pointed out that Sempra's proposal is likely to overestimate the utilities' actual revenue needs, and that the Sempra utilities have been able to recover substantial profit from the PTY attrition formula adopted in the Sempra utilities' 2012 GRC decision, which resulted in total increases of 2.65% in 2013 and 2.75% for both 2014 and 2015.</p> <p>UCAN advocated that the Commission adopt a formula using the All-Urban Consumer Price Index plus 75 basis points as was adopted in the 2012 GRC decision, which would result in annual increases of 2.6%-2.7%. UCAN additionally noted that while ORA's proposal for a 3.5% post-test year attrition rate provides for a higher level of revenue than UCAN proposes, it is not as high as the 4%-5% increases requested by Sempra, and UCAN's testimony directly supported ORA's 3.5% attrition proposal as an alternate proposal.</p> <p>The Settling Parties agreed to adopt a 3.5% attrition rate as a compromise between the ORA, UCAN, and Sempra proposals. In D.16-06-054 the Commission adopted a 3.5% attrition rate for 2017 and 2018.</p>	<p>“UCAN proposes that the current methodology of escalating post-test year capital additions based on CPI-Urban plus 75 basis points be continued. If this proposal is not adopted, ORA's proposal for 3.5% annual increases should be adopted instead. If Sempra's proposal is to be utilized, it must, at minimum, be corrected to exclude non-GRC spending, to use 2014 recorded data in place of forecast data, and to exclude 2015-2016 forecast data.”</p> <p>Exhibit 347, p. 56</p> <p>“UCAN presented testimony in opposition to the Applicants' PTY ratemaking adjustment. UCAN's testimony stated that the Applicants' approach would result in increases of about four to five percent in each of the attrition years. UCAN recommended that the Commission continue using the methodology of escalating PTY capital additions based on the All-Urban Consumer Price Index, plus 75 basis points. If UCAN's proposal is not adopted, UCAN recommended that ORA's proposal for 3.5% annual increases be adopted. In the SDG&E Settlement Comparison Exhibit at 13, the settling parties have agreed to ORA's PTY ratemaking recommendation of a 3.5% increase in 2017, and a 3.5% in 2018.</p> <p>D.16-06-054, p. 226-227</p> <p>“The settling parties have vigorously negotiated toward a PTY period and escalation rate that reflects compromises on both sides.”</p> <p>D.16-06-054, p. 34</p>	Verified.

<p>Insurance for SDG&E and SoCalGas</p> <p>Through testimony UCAN analyzed the Sempra utilities’ structure of insurance purchases and found that their total requested revenue increases of \$8.2 million should be denied. For different reasons, ORA asked that the Sempra utilities, and specifically SDG&E, face a reduction of \$7.422 million. In D.16-06-054 the Commission adopted the settlement amount of \$110 million for insurance, a reduction of \$1.5 million.</p> <p>The amount agreed to for insurance was a compromise between the litigation positions of ORA, UCAN, and the Sempra Utilities. UCAN’s testimony was different from and additive to ORA’s revenue requirement proposals, and was considered by the settling parties when negotiating the settlement terms..</p>	<p>“For the reasons cited above, I have concluded that the utilities’ forecasted additional expense of \$8.2 million for General and Wildfire Liability and Property Damage Reinsurance cannot be justified inasmuch as these programs fail to comply with the Company’s stated objective of purchasing ‘...broad coverage against catastrophic loss at the most economic cost feasible.’”</p> <p>Exhibit 346, p.14</p> <p>“The cost elements which make up the agreed upon A&G settlement amount of \$388.342 million include...\$110 million for corporate center-insurance... The settlement amounts for the A&G costs, as reflected at various pages in the SDG&E Settlement Comparison Exhibit, were found to be reasonable and adopted.”</p> <p>D.16-06-054, p. 144-145</p> <p>The adopted insurance revenue requirement is below Sempra’s request, as recommended by UCAN and ORA. As is noted in the Attachment 5 settlement agreement, the revenue requirement agreement “incorporated the positions taken in testimony sponsored by TURN and UCAN to the extent those positions were different from and additive to those put forward in ORA’s testimony.” As UCAN’s analysis of the insurance revenue requirement differed materially from ORA’s, UCAN’s analysis and testimony should be recognized as having contributed to the adopted insurance revenue requirement reduction.</p> <p>Attachment 5 of the Joint Motion for Adoption of Settlement Agreements section I. A. adopted in D.16-06-054.</p>	<p>Verified.</p>
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<p>SDG&E Bill Redesign</p> <p>In testimony UCAN opposed SDG&E’s IT funding requests of \$1.9 million in 2015 and \$1.4 million in 2016 for redesigning their customer’s bills. While we support the idea, SDG&E failed to give a detailed cost breakdown for the project. Without knowing how \$3.3 million will be spent (other than in very broad terms), UCAN requested that the Commission deny the request.</p> <p>The Commission approved a settlement that included SDG&E’s requested amounts for 2015 and 2016 IT proposals (including for the bill redesign). While UCAN’s proposal for a \$3.3 million reduction was not adopted in this instance, UCAN’s testimony provided support for other revenue requirement reductions that were agreed to by the Settling Parties and the Commission. As noted in the Attachment 5 settlement, UCAN position that were different from and additive to ORA’s testimony, such as UCAN’s position on bill redesign, were considered by the Sempra utilities and ORA prior to settling the overall revenue requirement amount..</p>	<p>“UCAN is supportive of the goal of redesigning bills in order to help customers better understand their energy usage and their bills. However, UCAN is troubled by the lack of information provided on the proposed budget and SDG&E’s inability to provide more a detailed breakdown of costs by activity. Without a more detailed forecast of bill redesign costs that justifies the need for \$3.3 million to complete this project, UCAN requests that funding be denied.”</p> <p>Exhibit 347, p. 84.</p> <p>“ORA did not oppose SDG&E’s forecast of capital expenditures for 2015 and 2016.”</p> <p>“UCAN objected to the IT capital funding request for the Bill Redesign Project due to insufficient details regarding the breakdown of costs by activity.”</p> <p>The Commission adopted SDG&E’s forecast of capital expenditures for 2015 and 2016.</p> <p>D.16-06-054, p. 136</p>	<p>Verified.</p>
<p>Non-revenue Requirement Issues</p>		
<p>Sempra’s Shareholder to Ratepayer Risk Shifting Proposals</p>		
<p>Sempra proposals for Two Way Balancing Accounts for TIMP and DIMP</p> <p>UCAN opposed the Sempra utilities’ attempt to have the costs for the gas transmission integrity management program (TIMP) and the distribution integrity management program (DIMP) subject to a two-way balancing account with a Tier 2 advice letter process.</p> <p>In testimony UCAN supported making TIMP and DIMP spending subject to a one-way balancing account and a Tier 2</p>	<p>“The SDG&E and SoCalGas TIMP and post-2011 DIMP balancing accounts should be converted to one-way balancing accounts, which may be reviewed using Tier 2 advice letters. If two-way balancing accounts are used for any part of TIMP or DIMP spending, a Tier 3 advice letter process should continue to be used to review requests for undercollection recovery.”</p> <p>Exhibit 347, p. 69</p>	<p>Verified.</p>

<p>advice letter process and requested, at minimum, that any two-way balancing accounts for TIMP/DIMP remain subject to a Tier 3 advice letter process.</p> <p>In the Attachment 5 settlement agreement, the Commission adopted UCAN's request that the TIMP and DIMP two-way balancing accounts be subject to a Tier 3 advice letter process. The Commission further adopted additional ratepayer protections for TIMP and DIMP spending that UCAN advocated for, namely that there would be a cap on the amount of undercollections that could be recovered through the Tier 3 advice letter process of no more than 35% of the 2016 GRC revenue requirement for these programs</p>	<p>“each utility will continue to maintain separate two-way balancing accounts for their Transmission Integrity Management Program (TIMP) and Distribution Integrity Management Program (DIMP) expenditures. The advice letter process for recovery of any TIMP or DIMP undercollections will be limited to undercollection amounts up to 35% of the 2016 GRC cycle total revenue requirement for that program and will require a Tier 3 advice letter. Any amounts above the 35% will be subject to a separate application procedure.”</p> <p>D.16-06-054, p. 27</p>	
<p>SoCalGas' Two Way Balancing Account proposal for SIMP</p> <p>In testimony SoCalGas proposed a storage integrity management program (SIMP) to fund gas well inspection and remediation. In cross examination SoCalGas witnesses described the costs of potential remediation as unknown and unknowable until an inspection had been performed. SoCalGas proposed that SIMP be subject to a two-way balancing account using a Tier 2 advice letter process. UCAN opposed a two-way balancing account and instead preferred that costs for remediation be submitted in the normal GRC process. Should the Commission establish a two-way balancing account then UCAN advocated the Commission require a Tier 3 advice letter process.</p> <p>Through negotiations UCAN and the Sempra utilities agreed in the Attachment 5 settlement agreement to a 2 way balancing account using a Tier 3 advice letter process and to limit advice letter recovery of any undercollections to amounts up to 35% of the 2016 GRC cycle total SIMP revenue requirement. Any amount above the 35% will be subject to a separate application procedure.</p>	<p>“UCAN [is] opposed to a two-way balancing account for SIMP....if a two-way balancing account is established, cost recovery must be via a Tier 3 advice letter.</p> <p>Exhibit 347, pp. 71-72</p> <p>“In Exhibit 347, UCAN opposed SoCalGas' request for a two-way balancing account for the SIMP costs due to the concern that SoCalGas would be allowed to recover funds in excess of the amount authorized.</p> <p>After hearings concluded, TURN and UCAN agreed with SoCalGas to establish a two-way balancing account for the SIMP expenditures with recovery procedures similar to the TIMP and DIMP. This is reflected in the Attachment 5 settlement agreement that is appended to the SoCalGas Settlement Motion. That provision of the Attachment 5 settlement agreement provides as follows:</p> <p>“SoCalGas will establish a two-way balancing account for SIMP expenditures. The advice letter process for recovery of any</p>	<p>Verified.</p>

<p>The Commission adopted the Attachment 5 settlement terms including this provision.</p>	<p>undercollections will be limited to undercollection amounts up to 35% of the 2016 GRC cycle total SIMP revenue requirement and will require a Tier 3 advice letter. Any amounts above the 35% will be subject to a separate application procedure.”</p> <p>D.16-06-054, pp. 246-247</p> <p>Finding-of-Fact</p> <p>189. The provision in the Attachment 5 settlement agreement wherein SIMP undercollections of up to 35% be recovered through the advice letter process, and undercollections above 35% be recovered through a separate proceeding, is reasonable.</p> <p>D.16-06-054, p. 310</p> <p>Conclusions-of-Law</p> <p>69. The agreement in the Attachment 5 settlement agreement wherein SIMP undercollections of up to 35% be recovered through the advice letter process, and undercollections above 35% be recovered through a separate proceeding, should be adopted.</p> <p>D.16-06-054, p. 323</p>	
<p>SDG&E’s Proposal for a Two-Way Tree Trimming Balancing Account</p> <p>In testimony UCAN opposed SDG&E’s request to shift their Tree Trimming Balancing Account (TTBA) from one-way balancing account to a two-way account. UCAN noted that SDG&E made the same request in its 2012 GRC filing, that the Commission denied that request, and that SDG&E had presented no evidence that would warrant reconsideration at this time.</p>	<p>“UCAN recommends that SDG&E’s proposal to convert the TTBA from a one-way balancing account to a two-way balancing account be denied. As described above in relation to the TIMP and DIMP accounts, one-way balancing accounts are appropriate to ensure that SDG&E bears the responsibility of producing reasonable forecasts and exercising good management practices to avoid cost overruns.”</p> <p>Exhibit 347, p. 77</p> <p>“SDG&E’s expenses for this program currently utilize a one-way balancing account. For this GRC</p>	<p>Verified.</p>

	<p>cycle, SDG&E is requesting a two-way balancing account.”</p> <p>D.16-06-054, p. 57</p> <p>“ORA and FEA contend that a two-way balancing account will allow SDG&E to spend without restriction, and that a one-way balancing account will result in less variability as to costs and encourage cost efficiency. UCAN also objects to SDG&E’s request for a two-way balancing account for the same reasons that ORA and FEA have provided.”</p> <p>D.16-06-054, p. 58</p> <p>“With regard to the treatment of the Vegetation Management costs, the settling parties agreement to continue the one-way balancing account treatment of these costs is reasonable and should be adopted. The one-way balancing account encourages SDG&E to perform the necessary activities related to tree trimming, and at the same time minimize costs for such activities.”</p> <p>D.16-06-054, p. 58-59</p>	
Customer Care Issues		
<p>SDG&E Branch Closure Proposals</p> <p>In testimony UCAN opposed SDG&E’s attempt to close/downgrade 3 branch offices as it would diminish customer service and would not save very much money. The adopted Attachment 5 settlement incorporates UCAN’s proposal, denying SDG&E’s requests to close the downtown and National City branch offices and to downgrade the Oceanside branch office to an authorized payment location at this time.</p>	<p>“In Exhibit 347, UCAN objects to the proposed closure of SDG&E’s two branch offices and the conversion of one branch office to an authorized payment location. UCAN contends that ‘It is essential to provide opportunities for cash payment transactions and non-payment services throughout SDG&E’s service territory for all customers and especially for low-income customers who may have reduced access to Internet and mobile payment methods and reduced mobility to travel to alternate locations.’ (Exhibit 347 at 86.) UCAN points out that the authorized payment locations do not provide the same level of service as</p>	<p>Verified.</p>

	<p>branch offices.”</p> <p>D.16-06-054, p. 124</p> <p>“Regarding SDG&E’s proposal to close two branch offices and convert a third into an authorized payment location, that issue is addressed as part of the Attachment 5 settlement agreement between SDG&E, SoCalGas, TURN and UCAN. Those settling parties have agreed that SDG&E can file a separate application to seek the closure of any existing branch offices during SDG&E’s TY 2016 GRC cycle. That portion of the Attachment 5 settlement agreement to SDG&E’s settlement motion, is reasonable and should be adopted.”</p> <p>D.16-06-054, pp. 131-132</p>	
<p>Service Establishment Charge</p> <p>In testimony SDG&E proposed charging customers one of two different amounts to establish electric service. For those customers who require a field visit, SDG&E proposed a \$25-dollar charge. For those customers whose service could be established remotely, SDG&E proposed a \$5.00 charge.</p> <p>UCAN objected to the bifurcated fee structure noting that often times customers require a field visit to establish service through no fault of their own. UCAN proposed a single fee of \$5.85 for all service connections.</p> <p>The adopted Attachment 5 settlement incorporates UCAN’s proposal for a service connection fee of \$5.85 for all customers.</p>	<p>"UCAN opposes the bifurcated fee structure that charges more for a fielded visit than for a non-fielded visit because many fielded visits are the result of circumstances or actions outside of the customer’s control or are a consequence of the customer’s Medical Baseline or Life Support condition.”</p> <p>Exhibit 347, p. 96</p> <p>“To prevent charging customers higher fees for circumstances beyond their control, UCAN recommends setting a single Service Establishment Charge for all gas and electric customers. This fee should be set to recover the \$3.9 million revenue requirement that SDG&E has forecast. Given SDG&E’s forecast of 669,000 service establishment orders (gas and electric combined), this results in a charge of \$5.85 per order.”</p> <p>Exhibit 347, p. 98</p> <p>“In the Attachment 5 Settlement Agreement to the SDG&E</p>	<p>Verified.</p>

	<p>Settlement Motion, the settling parties agree that SDG&E's service establishment charge will be set at \$5.85 for all customers. None of the parties have objected to this part of the Attachment 5 Settlement Agreement...</p> <p>It is also reasonable to adopt the agreement in the Attachment 5 Settlement Agreement to set SDG&E's service establishment charge for all customers at \$5.85. Setting this charge at \$5.85 will avoid having separate fee structures for service establishment activities that involve a field visit and those that do not require a field visit." D.16-06-054, pp. 222-223</p> <p>Findings-of-Fact 158. The provision to set the service establishment charge at \$5.85 for all customers is reasonable. D.16-06-054, p. 305</p> <p>58. The provision in the Attachment 5 Settlement Agreement to set SDG&E's service establishment charge for all customers at \$5.85 should be adopted. D.16-06-054, p. 321</p>	
<p>Rate Stabilization Proposal In testimony SDG&E proposed a "rate stabilization" plan, which provided that in the event that SDG&E does not receive a decision in time to implement rates effective January 1, 2016, SDG&E would not adjust rates for the roll-off GRC Memorandum Account balances associated with its 2012 GRC Phase 1 until such time as the 2016 GRC is implemented. UCAN opposed this plan, because it would unnecessarily continue the charge associated with the 2012 GRC for an indefinite period of time in exchange for moderating a future rate increase that may or may not materialize.</p>	<p>"The rate stabilization proposal imposes a cost on customers in that it overcharges customers for a period of time in exchange for moderating rate increases later on. This pre-charging of customers may present a hardship to customers who are of limited means. In addition, there is an equity concern whenever costs are shifted across time periods in that some of the customers paying the overcharges are likely to move out of SDG&E's service area or close their businesses prior to reaping the benefits of the reduced</p>	<p>Verified.</p>

<p>The adopted Attachment 5 settlement accepts UCAN's position and agrees that SDG&E's rate stabilization proposal will not be implemented.</p>	<p>increases...The proposal would only reduce notable rate volatility in the event of a sizable GRC electric rate increase, which may or may not materialize, and would maintain this overcharge for a potentially significant stretch of time.”</p> <p>Exhibit 347, pp. 104-105</p> <p>“In the Attachment 5 Settlement Agreement of the SDG&E Settlement Motion, TURN and UCAN agree with SDG&E that the rates for SDG&E's customers will be adjusted on January 1, 2016 to reflect the roll-off of the GRC memorandum account balances associated with SDG&E's 2012 GRC, irrespective of the timing of a final decision in SDG&E's TY 2016 GRC....</p> <p>This provision of the Attachment 5 Settlement Agreement to the SDG&E Settlement Motion is reasonable, and should be adopted.”</p> <p>D.16-06-054, p. 220</p>	
<p>ORA/Sempra PTY settlement calling for a 4 year GRC cycle.</p> <p>In comments UCAN opposed the Sempra/ORA Post Test Year settlement where they asked the Commission to adopt a 4 year GRC cycle. The Commission considered the responses by UCAN and others in opposition to this settlement and denied the Sempra Utilities/ORA proposal.</p>	<p>“TURN and UCAN urge the Commission to reject any attempt to modify the recently adopted three-year GRC cycle for all the major IOUs through this settlement.”</p> <p>Joint Comments Of The Utility Reform Network (TURN) And The Utility Consumers' Action Network (UCAN) Regarding The Settlement Agreement Of San Diego Gas & Electric Company, Southern California Gas Company And Office Of Ratepayer Advocates Regarding The Post-Test Year Period, filed October 12, 2015.</p> <p>“With respect to the PTY Settlement Motion, several parties filed responses in opposition to the</p>	<p>Verified.</p>

	<p>adoption of the PTY Settlement Agreement. A joint reply to those responses was also filed. Those responses and reply have been reviewed and considered.”</p> <p>D.16-06-054, p. 227</p> <p>“Since D.16-06-005 denied the petition to modify D.14-12-025 to change the GRC cycle from three to four years, the PTY Settlement Agreement in the PTY Settlement Motion is rendered null and void. Accordingly, this decision denies the PTY Settlement Motion to adopt the PTY Settlement Agreement, and there is no need to address a PTY attrition adjustment for 2019.”</p> <p>D.16-06-054, p. 228</p>	
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B. Duplication of Effort (§ 1801.3(f) and § 1802.5):

	Intervenor’s Assertion	CPUC Discussion
a. Was the Office of Ratepayer Advocates (ORA) a party to the proceeding?	Yes	Verified.
b. Were there other parties to the proceeding with positions similar to yours?	Yes	Verified.
c. If so, provide name of other parties: ORA, TURN, FEA, SDCAN		Agreed.
<p>d. Intervenor’s claim of non-duplication:</p> <p>As is noted in UCAN’s timesheets, UCAN spent several hours in coordination meetings with other parties – either individually with specific intervenors or collectively with the other parties in conference calls and/or meetings. This coordination minimized duplication between UCAN and other parties.</p> <p>More specifically, UCAN worked very closely with TURN to divide issues to ensure the broadest possible coverage of issues for both SDG&E and SoCalGas with the least duplication of effort between TURN and UCAN. In past GRCs, UCAN’s presentation would focus on SDG&E’s application and TURN’s would focus on SoCalGas’s application. For this proceeding, UCAN and TURN adjusted their approach to further reduce duplication of effort. While UCAN continued to focus primarily on SDG&E, and TURN continued to focus primarily on SoCalGas, UCAN and TURN identified crossover issues that are common to both utilities and designated one or the other of the parties to cover each of these issues for both utilities. For UCAN these crossover issues included New Business Capital needs - Customer growth, Post-Test Year Attrition rates,</p>		Agreed, UCAN did not engage in excessive duplication with other parties.

<p>insurance issues, and TIMP and DIMP balancing account issues. Covering these issues for both utilities eliminated the need for TURN to evaluate the same or similar issues for SoCalGas as UCAN was evaluating for SDG&E.</p> <p>UCAN's testimony, briefs, motions and comments advanced certain ratepayer protection issues that were not covered by other parties, provided discussion and analysis in opposition to certain recommendations from the utilities, and provided analysis that complemented presentations from other parties. For just a few examples, UCAN's showing was unique among intervenors for raising concerns about the Sempra utilities' request for unlimited use of two-way balancing accounts to collect for undercollections for their proposed TIMP, DIMP and SIMP programs. UCAN fought for and the Commission approved a 35% cap on undercollections for these programs that may be recovered through the use of a two-way balancing account. In another example, UCAN's testimony was unique in opposing higher Service Establishment Charges for SDG&E customers requiring field visits given that field visits may be required for reasons wholly outside of the customer's control. The adopted settlement adopts a single Service Establishment Charge of \$5.85 for all SDG&E customers, providing a reduction of \$19.15 compared to SDG&E's proposal for customers requiring field visit.</p> <p>UCAN's testimony was complimentary to other parties' on other issues. For example, UCAN advocated, in agreement with ORA, that SDG&E's proposal to close two of SDG&E's branch offices and to downgrade another to an Authorized Payment Location (APL) be rejected. UCAN supplemented ORA's testimony discussion of customer impacts from SDG&E's proposal with additional discussion and analysis not found in ORA's testimony, including a more in-depth discussion of the impacts to CARE customers and a delineation of some of the services available at a branch that would not be available at an APL. UCAN additionally responded to specific SDG&E arguments in support of its proposal that were not addressed in ORA's testimony, including SDG&E's claim that it will be forced to close one of the branches due to leasing difficulties. In adopting the TURN/UCAN settlement the Commission denied SDG&E's request in this GRC application to close the three branch offices.</p> <p>With regard to the revenue requirement amount, UCAN provided more in-depth analysis on specific issues to provide further factual support for revenue requirement reductions similar to those proposed by ORA and, in some cases, to support larger reductions than ORA had proposed. The ORA/Sempra Utilities settlement affirms that the parties considered these positions when negotiating revenue requirement issues. For example, UCAN's testimony on new business – customer forecasts, Post-Test Year ratemaking, and Insurance issues were all different and additive to ORA's presentation.</p> <p>Overall UCAN's presentation provided the Commission with unique expert and legal analysis on issues that enhanced the record of this proceeding and supported the conclusions of the Commission.</p>	
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PART III: REASONABLENESS OF REQUESTED COMPENSATION

A. General Claim of Reasonableness (§ 1801 and § 1806):

	CPUC Discussion
<p>UCAN’s compensation claim seeks reimbursement of \$264,011.57 for our presentation of the issues in these two utility GRC applications. Given the scope of the proceedings, their length, the voluminous record produced and the quality of UCAN’s presentation, our requested compensation is reasonable and we ask that it be granted.</p>	<p>Verified.</p>
<p>As has been noted above, SDG&E’s application requested a total revenue requirement of \$1,895,437,000 and SoCalGas requested \$2,331,187,000. In this proceeding 409 exhibits were entered into evidence including testimony, workpapers, and cross examination exhibits. The number of transcribed pages (through oral argument) for these proceedings total 3,247 pages. The NOI for both SDG&E and SoCalGas that started these proceedings were served on the parties on July 25, 2014, and the Commission issued their decision on July 1, 2016.</p>	
<p>Given the voluminous amount of testimony and issues to consider, UCAN tried to minimize costs by closely coordinating with TURN and having one of our respective experts handle each crossover issue for both utilities where possible so that TURN and UCAN experts would not need to review similar information individually for each utility. UCAN additionally coordinated with other parties to minimize duplication of effort.</p>	
<p>UCAN’s request is a very small percentage of the benefits the ratepayers received from our participation. As noted above, the Commission’s final decision in this proceeding reduced the amount awarded to SDG&E by \$104 million from what was requested and \$127 million for what SoCalGas requested. UCAN’s request of \$264,011.57 is also a small fraction of the \$1.1 million that was awarded to UCAN for our presentation in the last Semptra Utility GRC proceeding.</p>	
<p>Given the size, length, and complexity of the issues examined, the issues presented and resolved, and the quality of UCAN’s presentation as evidenced by the substantial mark UCAN has had on the outcome, UCAN’s compensation request is both reasonable and justified.</p>	
<p>Travel Expenses:</p> <p>UCAN is claiming travel expenses from San Diego to the Bay Area to attend the Prehearing Conference, Evidentiary Hearings, Settlement Conference and the Oral Arguments. As San Diego is more than 120 miles from San Francisco we ask that the air fares be reimbursed. For some of the trips Mr. Kelly flew up for the hearing and flew back to San Diego the same day. For the evidentiary hearings that lasted from May 22, 2015 through July 15 2015 Mr. Kelly stayed with</p>	

<p>relatives in Santa Clara. While UCAN is not seeking lodging reimbursement, Mr. Kelly did have to rent a car to get from Santa Clara to San Francisco for the hearings. UCAN is therefore seeking reimbursement for the car, gas and parking expenses that were incurred to avoid lodging expenses in San Francisco.</p>	
<p>b. Reasonableness of hours claimed:</p> <p>In this proceeding UCAN is seeking reimbursement for 920 hours (excluding travel and compensation claim preparation). These hours include attorney time to review the filings, hire experts, review testimony, coordinate the proceeding with other intervenors, attend hearings that started on June 22, 2015 and that ended almost 1 month later on July 15, 2015, negotiate settlement issues, file briefs and/or comments and attend oral arguments. The hours claimed also were used by UCAN’s experts who reviewed the thousands of pages of testimony and workpapers, who produced prepared direct testimony covering multiple issues and who supported UCAN in hearings and settlement discussions. Given the complexity of the issues presented and the volume of material to review, the amount of hours sought by UCAN and each of our representatives for our presentation in this proceeding are reasonable.</p> <p>UCAN Advocates:</p> <ul style="list-style-type: none"> • Donald Kelly was UCAN’s attorney throughout this proceeding. Mr. Kelly reviewed the filings and testimony, consulted and hired experts, served data requests, attended conferences and evidentiary hearings and was responsible for UCAN’s overall presentation. • Jane Krikorian – served as a UCAN advocate. Ms. Krikorian spent 1.75 hours helping with general preparation and took notes for conference calls with UCAN experts <p>UCAN Experts</p> <ul style="list-style-type: none"> • Robert Sulpizio – reviewed the insurance issues for both SDG&E and SoCalGas, proposed data requests, participated in conference calls with Sempra Utility witnesses, prepared UCAN’s insurance testimony and helped prepare UCAN’s counsel for cross examination on insurance issues. • Briana Kobor - Served as the witness, led analysis and testimony development, and developed cross examination questions on the SDG&E and SoCal Gas customer forecasts and their New Business revenue requirements. She additionally contributed substantially to analysis and testimony development on risk shifting and customer care issues. • Laura Norin - Served as overall MRW project manager and primary contact with UCAN; served as witness, led analysis and testimony development, and drafted cross examination question on the post-test year proposal; led analysis and testimony development and developed cross examination questions on risk shifting and customer care issues; scoped 	<p>Verified, <i>but see</i> CPUC Disallowances and Adjustments, below.</p>

<p>SDG&E's NOI to identify potential issues for testimony; coordinated with UCAN and other parties to refine UCAN testimony issues and approach; coordinated with MRW staff and oversaw their work; led MRW discovery efforts and overall testimony development and review; and assisted UCAN throughout settlement process and with briefs and other filings.</p> <ul style="list-style-type: none"> • Mark Fulmer - Served as the witness on risk-shifting proposals and customer care issues, edited the complete testimony, assisted in refining testimony and cross-examination issues, and assisted in coordination with TURN and their experts at JBS. • Ken Sosnick - Scoped SDG&E's NOI to identify potential issues for testimony and participated in initial strategy discussions. • Heather Mehta - Evaluated and refined the initial assessment of potential issues for testimony and drafted protest filing. • Naina Gupta - Developed initial analysis and testimony drafts on customer care issues, summarized discovery responses, cite-checked testimony, compiled attachments, and prepared witness books for hearings. <p>UCAN asks that the hours spent to prepare testimony on insurance, new business capital (Customer forecasts), Post Test Year ratemaking, opposition to Utility proposals to shift risk from shareholders to ratepayers, and customer care issues be deemed reasonable.</p> <p>NOI and Intervenor Compensation Claim Preparation Time:</p> <p>UCAN is asking that the Commission reimburse UCAN for 29.5 hours for the preparation of UCAN's NOI and intervenor compensation claim. This time represents 17.75 hours for UCAN's attorney Don Kelly and 11.75 hours for UCAN's expert Laura Norin. UCAN utilized Ms. Norin for the claim preparation as she had a good grasp of the issues presented in testimony, and was the lead expert for this proceeding at MRW and Associates. Given that her billing rate is less than that of Mr. Kelly, having Ms. Norin's help also reduced the overall costs for preparing this intervenor compensation claim. UCAN believes that the total time recorded to prepare this compensation claim is reasonable for the work required to produce it. In preparing the compensation claim UCAN had to review several documents, including party testimony, settlement agreements, ALJ rulings, the Commission decision and party comments. While review of these documents is necessary for every compensation claim, given the volume of the GRC material necessary for review here, 29.5 hours for claim preparation is reasonable.</p> <p>UCAN is not billing any hours for staff time to help prepare the documents for submission other than the hours claimed for Mr. Kelly and Ms. Norin.</p>	
<p>c. Allocation of hours by issue:</p> <p>Based on the entries in UCAN's attached timesheets, below is a breakdown of the hours we spent in this proceeding by the following issues and events:</p>	<p>Verified.</p>

Hours	Percentage of hours	Issues/events
86.50	9.40%	1. General Prep (GP)
5.25	.57%	2. Hearings, Workshops, and Conferences
87.75	9.54%	3. Filings (F)
133.75	14.54%	4. Discovery (D)
352.25	38.29%	5. Testimony (T)
43.25	4.70%	6. Coordination (C)
158	17.17%	7. Evidentiary Hearings (EH)
53.25	5.79%	8. Settlement (S)

While the above chart breaks down the issues by General Preparation time and events, UCAN has also estimated a further breakdown of hours, between time devoted to specific issues that UCAN advocated for in our presentation. This estimate is for the total time for UCAN's attorney and experts and is based on a review of timesheets submitted with this compensation request, as well as the testimony and filings UCAN has submitted. The estimated breakdown of hours by these additional issues is as follows:

- New Business – Sales and Customer Forecasts - 26.12%
- Regulatory balancing account issues including TIMP, DIMP and SIMP two-way balancing account and undercollection cost recovery cap proposals and Tree Trimming balancing account issues - 6.57%
- Customer service issues including Branch Office Closings, Customer Bill Redesign, Service Establishment Charge, Rate Stabilization Plan, and pilot relight forecasts - 25.20%
- Post Test Year Ratemaking Issues - 20.63%
- Insurance issues – 21.34%

B. Specific Claim:*

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Donald Kelly	2014	25.75	\$335	D.16-06-028	\$8,626.25	25.25	335.00	8,458.75
Donald Kelly	2015	304.25	\$335	D.16-06-028	\$101,923.75	299.00	335.00	100,165.00
Donald Kelly	2016	28.75	\$350	D.16-06-028	\$10,062.5	34.25	340.00 <i>See Res. ALJ-329.</i>	11,645.00

Jane Krikorian	2014	1.25	\$150	D.16-06-028	\$187.50	1.25	150.00	187.50
Jane Krikorian	2015	.5	\$150	D.16-06-028	\$75	0.50	150.00	75.00
Robert Sulpizio	2015	85	\$390	D.14-08-025	\$33,150	85.00	410.00 <i>See Res. ALJ-287, 303, and 308.</i>	34,850.00
Briana Kobor	2015	136.75	\$170	D.14-06-049, and <i>see</i> comment 2	\$23,247.5	136.75	170.00 [1]	23,247.50
Heather Mehta	2014	10.75	\$275	D.14-08-025	\$2,956.25	10.75	295.00 <i>See Res. ALJ-287, 303, and 308.</i>	3,171.25
Ken Sosnick	2014	12.75	\$205	See comment 3 below	\$2,613.75	12.75	205.00	2,613.75
Ken Sosnick	2015	2	\$205	See comment 3 below	\$410	2.00	205.00	410.00
Laura Norin	2014	25.25	\$245	D.14-08-025	\$6,186.25	25.25	250.00 <i>See Res. ALJ-303.</i>	6,312.50
Laura Norin	2015	192.25	\$245	D.14-08-025	\$47,101.25	192.25	250.00 <i>See Res. ALJ-308.</i>	48,062.50
Laura Norin	2016	2	\$274	See comment 4 below	\$548	2.00	270.00 [2]	540.00
Mark Fulmer	2015	22	\$275	D.14-10-044	\$6,050	22.00	295.00 <i>See Res. ALJ-281, 287, 303, and 308.</i>	6,490
Naina Gupta	2015	71	\$126	See comment 5 below	\$8,946	71.00	135.00 [3]	9,585.00
Subtotal: \$ 252,084.00						Subtotal: \$ 255,813.75		

OTHER FEES								
Describe here what OTHER HOURLY FEES you are Claiming (paralegal, travel **, etc.):								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate	Total \$
Donald Kelly travel time	2015	19.75	\$167.50	D.16-06-028	\$3,308.12	19.00 [2]	167.50	3,182.50
Donald Kelly travel time	2016	8.5	\$175	D.16-06-028	\$1,487.5	8.50	172.50	1,466.25
Subtotal: \$4,795.62						Subtotal: \$4,648.75		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate	Total \$
Donald Kelly	2015	3	\$167.5	D.16-06-028	\$502.50	3.00	167.50	502.50
Donald Kelly	2016	14.75	\$175	D.16-06-028	\$2,581.25	14.75	172.50	2,544.38
Laura Norin	2016	11.75	\$137	See Comment 4 below	\$1,609.75	11.75	135.00	1,586.25
Subtotal: \$4,693.50						Subtotal: \$4,633.13		
COSTS								
#	Item	Detail			Amount	Amount		
	Travel and mailing costs	Travel costs including airfare, BART expenses for one day trips to the Commission, car rental while in SF area for month of hearings in June and July 2015, and parking costs. Costs also include FedEx and mailing costs			\$2,438.45	\$2,438.45		
TOTAL REQUEST: \$264,011.57						TOTAL AWARD: \$267,534.08		
<p>**We remind all intervenors that Commission staff may audit their records related to the award and that intervenors must make and retain adequate accounting and other documentation to support all claims for intervenor compensation. Intervenor’s records should identify specific issues for which it seeks compensation, the actual time spent by each employee or consultant, the applicable hourly rates, fees paid to consultants and any other costs for which compensation was claimed. The records pertaining to an award of compensation shall be retained for at least three years from the date of the final decision making the award.</p> <p>**Travel and Reasonable Claim preparation time typically compensated at ½ of preparer’s normal hourly rate.</p>								

ATTORNEY INFORMATION			
Attorney	Date Admitted to CA BAR ¹	Member Number	Actions Affecting Eligibility (Yes/No?)
Donald Kelly	December 5, 1990	151095	No.

C. Intervenor's Comments on Part III:

Comment #	Intervenor's Comment(s)
2	<p>UCAN is asking that Briana Kobor's rate be increased to \$170 an hour from the rate of \$135 an hour that was given in D.14-06-049 for work in 2012. Ms. Kobor is an energy consultant and a rate expert with a degree in Environmental Economics and Policy from the University of California at Berkeley and 8 years of experience. Since leaving MRW in July 2015, she has been serving as the Program Direct, DG Regulatory Policy at Vote Solar. Ms. Kobor has not had a rate, step or COLA increase for her work before the Commission since 2012.</p> <p>Over the years since her last rate assessment, Ms. Kobor has transitioned from an analyst with supporting roles on projects to an expert, serving as the lead analyst, witness, and project manager on projects. She served as an expert in SCE's General Rate Case Phase 2 on behalf of the Coalition for Affordable Street Lights, in the current proceeding on behalf of UCAN, and in several out-of-state proceedings related to net metering on behalf of Vote Solar. She also served as the lead analyst in MRW's utility rate forecasting practice and has extensive experience developing testimony in utility rate cases and other energy proceedings at the Commission.</p> <p>UCAN believes a rate increase from \$135 an hour to \$170 an hour is appropriate given her professional growth during this time period, her expertise on utility rate cases, and the depth of her experience at the Commission. UCAN's requested billing rate for Ms. Kobor is on the lower end of the compensation range for experts with 7-12 years of experience (between \$170 to \$285 for 2015.)</p> <p>The proposed hourly compensation rate of \$170 an hour is the rate that UCAN was charged for Ms. Kobor's work in this proceeding. Ms. Kobor's resume has been filed with this compensation claim as attachment 2.</p>
3	<p>Pursuant to Resolution ALJ-308, experts with 13+ years of experience qualify for an intervenor compensation rate range of \$170-\$420 per hour for 2014-2015. UCAN requests that the Commission approve a rate of \$205 an hour for Ken Sosnick for his work in this proceeding. UCAN believes that this rate is justified given Mr. Sosnick's 13 years of experience and his deep expertise in utility accounting and utility cost of service issues. Mr. Sosnick earned his Bachelors of Science degree in Accounting from the Indiana University of Pennsylvania in 2003 and then worked at FERC for 10 years, first as an auditor and then as an Energy Industry Analyst-Expert Witness. At FERC, he concentrated on cost of service, cost allocation, and rate design issues, primarily for pipelines, and he constructed cost of service models for natural gas pipeline companies in more than a dozen proceedings. In 2013, Mr. Sosnick joined MRW & Associates as a Senior Project Manager, where he</p>

¹ This information may be obtained through the State Bar of California's website at <http://members.calbar.ca.gov/fal/MemberSearch/QuickSearch>.

	<p>continued to be active in FERC ratemaking proceedings while also assisting clients in regulatory proceedings at the Commission, primarily pertaining to electric and natural gas cost of service and revenue allocation issues. Since November 2015 he has served as a Senior Project Manager for Concentric Energy Advisors.</p> <p>In this proceeding, Mr. Sosnick contributed his expertise in utility accounting and utility cost of service and his extensive experience in utility rate case proceedings to assist in the evaluation of potential issues for UCAN to pursue in this proceeding and in the development of UCAN's case strategy.</p> <p>The proposed hourly compensation rate of \$205 is the rate that UCAN was charged for Mr. Sosnick's work in this proceeding. Mr. Sosnick's resume has been filed with this compensation request as attachment 2</p>
4	<p>UCAN is asking that Laura Norin's rate be increased from the rate of \$245 an hour that was given in D.14-08-025 for work in 2015 to \$274 an hour starting in 2016. It has been over 3 years since her last rate assessment.</p> <p>Ms. Norin is an energy consultant and a rate expert with a graduate degree in Applied Physics and 13 years of experience, including close to 12 years of experience at MRW & Associates, LLC, and prior experience as a research associate at Lawrence Berkeley National Laboratory.</p> <p>Ms. Norin regularly serves as an expert before the Commission. Ms. Norin has served as an expert in the SONGS DCE proceeding on behalf of UCAN, SCE's General Rate Case Phase 1 on behalf of the Coalition for Affordable Street Lights, in SCE's General Rate Case Phase 2 on behalf of the California Farm Bureau Federation, in SDG&E's Rate Design Window on behalf of the California Farm Bureau Federation, in Pacific Gas and Electric (PG&E)'s General Rate Case Phase 1 on behalf of the South San Joaquin Irrigation District, in a PG&E Erra proceeding on behalf of the California Farm Bureau Federation, and in this current proceeding on behalf of UCAN. Ms. Norin was previously a key author of several reports to the California Energy Commission on issues concerning nuclear power in California, and she has additionally authored more than a dozen articles in industry publications regarding California energy regulatory issues and developments.</p> <p>Ms. Norin has not had a rate, step or COLA increase for her work since 2013. UCAN believes a rate increase from \$245 an hour to \$274 an hour is appropriate given the quality of Ms. Norin's work; her familiarity with utility revenue requirement, cost responsibility, rate issues examined in this proceeding, and the depth of her experience at the Commission. UCAN's requested billing rate for Ms. Norin is on the lower end of the compensation range for experts with 13+ years of experience (between \$170 to \$420.)</p> <p>The proposed hourly compensation rate of \$274 an hour in 2016 is the rate that UCAN was charged for her work in this proceeding.</p>
5	<p>Pursuant to Resolution ALJ-308, experts with 0-6 years of experience qualify for an intervenor compensation rate range of \$140-\$200 per hour. UCAN requests that the Commission approve a rate of \$126 an hour for Naina Gupta.</p> <p>UCAN believes that this rate is justified given Ms. Gupta's experience. In 2014, Ms. Gupta joined MRW & Associates, LLC, as an Associate, where she conducts research and analyses related to California energy markets, electricity and natural gas rates, and other energy regulatory and policy issues and monitors California energy regulatory developments.</p>

	<p>Ms. Gupta previously conducted research for a number of renewable energy and energy efficiency projects for the Environmental Defense Fund and for Lawrence Berkeley National Laboratory. Ms. Gupta holds an M.S. degree in Energy and Resources from the University of California, Berkeley.</p> <p>UCAN is aware of 2 pending intervenor compensation claims requesting a rate be established for Ms. Gupta. In a compensation request filed on June 27, 2016 in A.14-12-007, UCAN requested a rate of \$126 an hour for Ms. Gupta's work. In a compensation request by the Interstate Renewable Energy Council (IREC) filed on June 29, 2016 in R.12-06-013, they requested a rate of \$135 an hour, noting Ms. Gupta's education and experience and that the requested rate is below the minimum range for experts with 0-6 years of experience. Both requested rates are below the minimum compensation level of \$140 an hour for experts with 0-6 years' experience.</p> <p>UCAN was charged \$126 an hour for Ms. Gupta's work in this proceeding. Ms. Gupta's resume has been filed with this compensation request as attachment 2.</p>
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D. CPUC Disallowances and Adjustments:

Item	Reason
[1]	The Commission approves a rate of \$170 for Kobor, as she has transitioned into higher range of experience. A rate of \$170 is appropriate for an expert with 7-12 years of experience practicing before the Commission.
[2]	Based on the level of experience presented by UCAN, the Commission approves a rate of \$270 for Norin. This rate is appropriate for an expert with 12+ years of experience.
[3]	The Commission sets Gupta's first time rate at \$135 based on the experience presented by UCAN.
[4]	The Commission will not compensate Kelly for the hours spent booking travel.

PART IV: OPPOSITIONS AND COMMENTS
Within 30 days after service of this Claim, Commission Staff
or any other party may file a response to the Claim (*see* § 1804(c))

A. Opposition: Did any party oppose the Claim?	No.
B. Comment Period: Was the 30-day comment period waived (<i>see</i> Rule 14.6(c)(6))?	Yes.

FINDINGS OF FACT

- Utility Consumers' Action Network has made a substantial contribution to D.16-06-054.
- The requested hourly rates for Intervenor's representatives, as adjusted herein, are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services.

3. The claimed costs and expenses, as adjusted herein, are reasonable and commensurate with the work performed.
4. The total of reasonable compensation is \$267,534.08.

CONCLUSION OF LAW

1. The Claim, with any adjustment set forth above, satisfies all requirements of Pub. Util. Code §§ 1801-1812.

ORDER

1. Utility Consumers' Action Network shall be awarded \$267,534.08.
2. Within 30 days of the effective date of this decision, San Diego Gas & Electric Company and Southern California Gas Company shall pay Utility Consumers' Action Network their respective shares of the award, based on their California-jurisdictional gas and electric revenues for the 2015 calendar year, to reflect the year in which the proceeding was primarily litigated. Payment of the award shall include compound interest at the rate earned on prime, three-month non-financial commercial paper as reported in Federal Reserve Statistical Release H.15, beginning November 13, 2016, the 75th day after the filing of Utility Consumers' Action Network's request, and continuing until full payment is made.
3. The comment period for today's decision is waived.
4. This decision is effective today.

Dated October 27, 2016, at San Francisco, California.

MICHAEL PICKER
President
MICHEL PETER FLORIO
CATHERINE J.K. SANDOVAL
LIANE M. RANDOLPH
Commissioners

Commissioner Carla J. Peterman,
being necessarily absent, did not
participate.

APPENDIX**Compensation Decision Summary Information**

Compensation Decision:	D1610033	Modifies Decision?	No
Contribution Decision(s):	D1606054		
Proceeding(s):	A1411003, A1411004		
Author:	ALJ Wong, ALJ Lirag		
Payer(s):	San Diego Gas & Electric Company and Southern California Gas Company		

Intervenor Information

Intervenor	Claim Date	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
Utility Consumers' Action Network (UCAN)	August 30, 2016	\$264,011.57	\$267,534.08	N/A	See CPUC Disallowances and Adjustments, above.

Advocate Information

First Name	Last Name	Type	Intervenor	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Donald	Kelly	Attorney	UCAN	\$335.00	2014	\$335.00
Donald	Kelly	Attorney	UCAN	\$335.00	2015	\$335.00
Donald	Kelly	Attorney	UCAN	\$350.00	2016	\$340.00
Jane	Krikorian	Expert	UCAN	\$150.00	2014	\$150.00
Jane	Krikorian	Expert	UCAN	\$150.00	2015	\$150.00
Robert	Sulpizio	Expert	UCAN	\$390.00	2015	\$410.00
Briana	Kobor	Expert	UCAN	\$170.00	2015	\$170.00
Heather	Mehta	Expert	UCAN	\$275.00	2014	\$295.00
Ken	Sosnick	Expert	UCAN	\$205.00	2014	\$205.00
Ken	Sosnick	Expert	UCAN	\$205.00	2015	\$205.00
Laura	Norin	Expert	UCAN	\$245.00	2014	\$250.00
Laura	Norin	Expert	UCAN	\$245.00	2015	\$250.00
Laura	Norin	Expert	UCAN	\$274.00	2016	\$270.00
Mark	Fulmer	Expert	UCAN	\$275.00	2015	\$295.00
Naina	Gupta	Expert	UCAN	\$126.00	2015	\$135.00

(END OF APPENDIX)